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Attorneys for Defendant
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**UNITED STATES DISTRICT COURT
 NORTHERN DISTRICT OF CALIFORNIA**

ANIBAL RODRIGUEZ, SAL CATALDO, JULIAN
 SANTIAGO, and SUSAN LYNN HARVEY, *al.*
 individually and on behalf of all others similarly
 situated,

Plaintiffs,

vs.

GOOGLE LLC,

Defendant.

Case No. 3:20-CV-04688 RS

**JOINT PROPOSED JURY
 QUESTIONNAIRE QUESTIONS**

Courtroom: 3 - 17th Floor
 Judge: The Honorable Richard Seeborg

Action filed: July 14, 2020
 Trial Date: August 18, 2025

Proposed Additional Jury Questionnaire Questions

Plaintiffs and Google (“the Parties”) jointly stipulate to the addition of the following ten questions below to the Northern District of California’s model jury questionnaire for prospective jurors in this case.

1. Have you, a family member, or anyone close to you ever worked for or had experience with the following?: (please check the box for all that apply)

☐ **Technology Companies**

☐ **Social Media Companies**

☐ **Google**

☐ **Companies Working For or With Google**

☐ **Software Development**

☐ **App Development**

☐ **Data Security/Cybersecurity**

If you checked the box for any of the above, please state who they are (yourself, a family member, and/or someone close to you) and describe the experience:

2. Do you have any education, training, or experience with data or data privacy?

☐ **Yes**

☐ **No**

If you checked yes, please describe:

3. Do you have any strong positive or negative views about Google? If yes, please explain.

4. Have you, any member of your family, or anyone close to you ever been harmed as a result of information you or they shared online, or from identity theft? If yes, please explain.

5. Do you consider yourself to be tech-savvy?

☐ Yes

☐ No

6. Do you turn off Web & App Activity or Supplemental Web & App Activity for privacy when using Google's apps, products, devices, or services?

☐ Yes

☐ No

7. Please indicate if you agree or disagree with the following statement: "I am not at all concerned about how technology companies use my data."

☐ Agree

☐ Disagree

☐ Unsure

8. Please indicate if you agree or disagree with the following statement: "When it comes to data collection by companies, the potential benefits outweigh the risks."

☐ Agree

☐ Disagree

☐ Unsure

9. Do you believe that large technology companies intrude on consumers' privacy without their permission for the purpose of collecting their private data? If yes, please explain.

10. Are you hesitant to share private information online or with software apps you use? If yes, please explain.

Dated: June 20, 2025

Respectfully submitted,

BOIES SCHILLER FLEXNER LLP

By: /s/ Mark C. Mao

Mark C. Mao
Beko Reblitz-Richardson
Attorneys for Plaintiffs

Dated: June 20, 2025

SUSMAN GODFREY L.L.P.

By: /s/ Bill Carmody

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Shawn J. Rabin (pro hac vice)
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Dated: June 20, 2025

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FILER'S ATTESTATION

Pursuant to Civil Local Rule 5.1, I attest that all signatories listed, and on whose behalf this filing is submitted, concur in the filing's content and have authorized this filing.

Dated: June 20, 2025

Respectfully submitted,

BOIES SCHILLER FLEXNER LLP

By: /s/ Mark C. Mao

Mark C. Mao

Attorney for Plaintiffs